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Via ECF

April 23, 2015

Hon. Steven I. Locke, U.S.M.J.  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: Choudry Tahir Awan v. Hamid Khan Durrani a/k/a Zahid Durrani  
and Bay Shore Smoke Shop  
Case No.: 14-CV-4562 (JMA)(SIL)  
Our File No.: 142114-2663

Dear Judge Locke:

I am sending this letter to respectfully request an extension of time to file the Defendants' opposition papers to Plaintiff's Motion for Summary Judgment.

Pursuant to the briefing schedule that was set forth at the conference that took place on February 27, 2015, the Defendants' opposition papers to Plaintiff's Motion for Summary Judgment were supposed to be served on or before April 20, 2015. Due to an extremely heavy caseload and a staffing issue in my office, I was unable to meet with my client, Hamid Durrani, to fully discuss this motion, and I was unable to complete the opposition papers by that date.

On April 20, 2015, I communicated with Eliot F. Bloom, Esq., the attorney for the Plaintiff, via e-mail to request his consent to an extension of time to serve the opposition papers. Mr. Bloom was courteous, as he has been throughout the course of this litigation, and he consented to an extension. Unfortunately, Mr. Bloom was only able to consent to an extension of time to April 23, 2015. This extension did not provide me with enough time to complete my opposition papers.

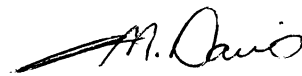
In this regard, I am respectfully requesting an extension of time to April 29, 2015 to serve and file the opposition papers to Plaintiff's Motion for Summary Judgment.

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I do not believe that the Plaintiff would suffer any prejudice as a result of this extension. However, the Defendants' would suffer extreme prejudice if they cannot serve and file opposition papers to the Plaintiff's motion.

Thank you for your courtesy in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "A. Davis", with a long horizontal stroke extending to the left.

Alan M. Davis

cc: Via ECF  
Eliot F. Bloom, Esq.  
1551 Kellum Place, 2<sup>nd</sup> Floor  
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